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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

JAN 07 2015

AT 8:30  
WILLIAM T. WALSH  
CLERK

UNITED STATES OF AMERICA	:	Criminal No. 13-429 (RBK)
	:	
v.	:	
	:	
CARL WILES,	:	21 U.S.C. §§ 846, 841(a)(1) and
a/k/a "Call Call,"	:	(b)(1)(C), 843(b), 856, and
FUQUAN PULLIAM,	:	18 U.S.C. §§ 922(g)(1), 924(c) and 2;
a/k/a "FU,"	:	
KHALIL MIMS,	:	21 U.S.C. § 853
a/k/a "Lil,"	:	
KEITH JACKSON,	:	
a/k/a "Tick,"	:	
JUSTIN GOULD,	:	
a/k/a "Jay,"	:	
MARQUEIS THOMAS RANDALL,	:	
a/k/a "Marty,"	:	
WILLIAM GIDEON,	:	
a/k/a "Will," and	:	
ELQUINZIE LEWIS,	:	
a/k/a "Quince Lewis"	:	

**SECOND SUPERSEDING INDICTMENT**

The Grand Jury in and for the District of New Jersey, sitting at Camden, charges:

**COUNT 1**

**[21 U.S.C. § 846 - Conspiracy to Distribute and Possess with Intent to Distribute Crack Cocaine, Heroin and Cocaine]**

1. From in or about December 2011 to in or about April 2013, in Camden County, in the District of New Jersey, and elsewhere, defendants

CARL WILES, a/k/a "Call Call,"  
FUQUAN PULLIAM, a/k/a "Fu,"  
KHALIL MIMS, a/k/a "Lil,"  
KEITH JACKSON, a/k/a "Tick,"  
JUSTIN GOULD, a/k/a "Jay,"  
MARQUEIS THOMAS RANDALL, a/k/a "Marty,"

WILLIAM GIDEON, a/k/a "Will," and  
ELQUINZIE LEWIS, a/k/a "Quince Lewis,"

did knowingly and intentionally conspire and agree with others to distribute  
and to possess with intent to distribute:

(a) 280 grams or more of a mixture and substance containing a  
detectable amount of cocaine base (hereinafter "crack cocaine"), a Schedule II  
drug controlled substance, contrary to Title 21, United States Code, Sections  
841(a)(1) and (b)(1)(A);

(b) 100 grams or more of a mixture and substance containing a  
detectable amount of heroin, a Schedule I drug controlled substance, contrary  
to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B); and

(c) a mixture and substance containing a detectable amount of cocaine, a  
Schedule II drug controlled substance, contrary to Title 21, United States Code,  
Sections 841(a)(1) and 841(b)(1)(C).

2. At times relevant to this Second Superseding Indictment,  
defendants CARL WILES, a/k/a "Call Call," FUQUAN PULLIAM, a/k/a "Fu,"  
KHALIL MIMS, a/k/a "Lil," KEITH JACKSON, a/k/a "Tick," JUSTIN GOULD,  
a/k/a "Jay," MARQUEIS THOMAS RANDALL, a/k/a "Marty," WILLIAM  
GIDEON, a/k/a "Will," and ELQUINZIE LEWIS, a/k/a "Quince Lewis" and  
others constituted an organization involved in the distribution of controlled  
substances, such as cocaine, crack cocaine and heroin at locations in the  
Camden, New Jersey area and elsewhere. Among other things, the  
organization controlled and directed the street-level drug distribution at certain

locations in Camden, New Jersey known as drug sets or drug points, including areas near 8<sup>th</sup> and Tulip Streets.

3. At times relevant to this Second Superseding Indictment:

a. defendants CARL WILES and FUQUAN PULLIAM were partners and leaders of the organization who directed its drug distribution activities and mediated disputes among its members;

b. defendants CARL WILES and FUQUAN PULLIAM obtained cocaine and crack cocaine for the organization and arranged for its distribution;

c. defendant KEITH JACKSON, among others, supplied heroin to the organization;

d. defendant KHALIL MIMS acted as a manager, coordinating the drug distribution activities of the individuals who worked on the drug set at 8<sup>th</sup> and Tulip Streets in Camden, New Jersey, collected the proceeds from the drug sales, and assisted in the bulk distribution of cocaine, crack cocaine and heroin;

e. defendants CARL WILES, FUQUAN PULLIAM, KHALIL MIMS, JUSTIN GOULD, MARQUEIS THOMAS-RANDALL and others maintained and used locations in Camden, New Jersey for the purpose of manufacturing cocaine into crack cocaine and storing cocaine, crack cocaine, and heroin prior to its distribution;

f. defendants JUSTIN GOULD, MARQUEIS THOMAS RANDALL, WILLIAM GIDEON, ELQUINZIE LEWIS, and others worked at the

drug set located at 8<sup>th</sup> and Tulip Streets in Camden selling cocaine, crack cocaine and heroin.

**OBJECT, MANNER AND MEANS OF THE CONSPIRACY**

4. It was the object of the conspiracy to distribute controlled substances in Camden, New Jersey and elsewhere for profit.

5. It was a part of the conspiracy that certain conspirators maintained an open air drug market in the area of 8<sup>th</sup> and Tulip Streets in Camden, New Jersey which sold cocaine, crack cocaine and heroin 24 hours a day, seven days a week.

6. It was further a part of the conspiracy that certain conspirators obtained cocaine and heroin for distribution in Camden.

7. It was further a part of the conspiracy that members and associates of the organization used cellular telephones to communicate with each other by calls and through text messages. In the calls and text messages, members of the organization used coded language to discuss the acquisition of cocaine, crack cocaine and heroin; the availability of cocaine, crack cocaine and heroin for purchase and redistribution; the location of cocaine, crack cocaine and heroin customers; and the amounts of cocaine, crack cocaine and heroin requested.

8. It was a further part of the conspiracy that certain conspirators converted some of the cocaine into crack cocaine, and processed and packaged the crack cocaine for distribution by adding dilutants and placing the crack cocaine into bags that were colored or were stamped with brand names or

markings, such as blue bags. The cocaine and heroin were in bags that were colored or were stamped with brand names or markings such as "red devil," "superman," "batman," "green dinosaur" or in clear bags or yellow bags. The drugs were placed in particular bags to distinguish it from other cocaine, crack cocaine and heroin sold in Camden, New Jersey.

9. It was a further part of the conspiracy that certain conspirators sold the cocaine, crack cocaine and heroin at drug sets in Camden, New Jersey and elsewhere.

10. It was a further part of the conspiracy that certain conspirators retrieved, transferred, and transported the proceeds of the drug sales.

11. It was a further part of the conspiracy that certain conspirators used several properties in and around the Crestbury Apartments in Camden, New Jersey to store cocaine, crack cocaine, heroin, drug proceeds and firearms.

12. It was a further part of the conspiracy that the conspirators engaged in their illegal activities in ways designed to minimize detection and apprehension by law enforcement, such as the use of "lookouts," different rental vehicles and storing drugs and the proceeds of the drug sales in the residences of family members.

13. It was a further part of the conspiracy that the conspirators attempted to acquire handguns and ammunition; did possess handguns, shotgun, rifles and ammunition; and stored and transferred firearms from one

location to another and from one member or associate to another as needed throughout the course of the conspiracy.

14. It was a further part of the conspiracy that the organization obtained, carried and used firearms to maintain control over and protect its operations through violence and threats of violence.

In violation of Title 21, United States Code, Section 846.



**COUNT 2**

**[18 U.S.C. § 924(c) – Possession and Use of a Firearm During a Drug Trafficking Crime and Aiding and Abetting Thereof]**

1. Paragraphs 2 through 14 of Count 1 of this Second Superseding Indictment are incorporated as if set forth in full herein.

2. From in or about December 2011 to in or about April 2013, in Camden County, in the District of New Jersey, and elsewhere, defendants

CARL WILES, a/k/a “Call Call,”  
FUQUAN PULLIAM, a/k/a “Fu,”  
KHALIL MIMS, a/k/a “Lil,”  
KEITH JACKSON,  
JUSTIN GOULD, a/k/a “Jay,”  
MARQUEIS THOMAS RANDALL, a/k/a “Marty,” and  
WILLIAM GIDEON, a/k/a “Will,”

during and in relation to a drug trafficking crime, that is, conspiracy to distribute and possess with the intent to distribute cocaine, crack cocaine and heroin, as charged in Count 1 of this Second Superseding Indictment, did knowingly and intentionally use, carry, possess, brandish and discharge a firearm in furtherance of the drug trafficking crime.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i), (ii) and (iii), and Title 18, United States Code, Section 2.

**COUNTS 3 to 18****[Distribution and Possession with Intent to Distribute Crack Cocaine, Heroin and Cocaine]**

1. Paragraphs 2 through 14 of Count 1 of this Second Superseding Indictment are incorporated as if set forth in full herein.

2. On or about the dates set forth below, in Camden County, in the District of New Jersey, and elsewhere, the defendants indicated below did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, crack cocaine, Schedule II controlled substances, or heroin, a Schedule I controlled substance as set forth below:

COUNT	DATE	DEFENDANT	CONTROLLED SUBSTANCE
3	9/18/2012	CARL WILES	Heroin
4	9/26/2012	CARL WILES	Heroin
5	10/10/2012	CARL WILES	Heroin
6	10/23/2012	CARL WILES	Heroin
7	11/20/2012	CARL WILES	Heroin
8	12/5/2012	CARL WILES	Heroin
9	12/18/2012	CARL WILES	Heroin
10	1/8/2013	CARL WILES FUQUAN PULLIAM	Heroin Cocaine
11	1/15/2013	FUQUAN PULLIAM	Cocaine Crack Cocaine
12	1/29/2013	FUQUAN PULLIAM	Heroin Cocaine
13	1/30/2013	JUSTIN GOULD	Heroin
14	2/8/2013	CARL WILES FUQUAN PULLIAM	Heroin Cocaine
15	2/21/2013	FUQUAN PULLIAM	Heroin Crack Cocaine
16	2/26/2013	WILLIAM GIDEON	Cocaine Crack Cocaine
17	3/14/2013	WILLIAM GIDEON	Heroin Crack Cocaine



18	3/14/2013	FUQUAN PULLIAM	Crack Cocaine
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In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNTS 19 to 61**  
**[Use of a Communication Facility]**

1. Paragraphs 2 through 14 of Count 1 of this Second Superseding Indictment are incorporated as if set forth in full herein.

2. On or about the dates, and at or about the times indicated below, in Camden County, in the District of New Jersey, and elsewhere, the defendants indicated below did knowingly and intentionally use, and cause to be used, a communication facility, that is, a cellular telephone, in facilitating the knowing and intentional conspiracy to distribute and possess with intent to distribute cocaine and crack cocaine, both Schedule II drug controlled substances, and heroin, a Scheduled I drug controlled substance, a felony pursuant to Title 21, United States Code, Section 846:

<b>COUNT</b>	<b>DATE OF OFFENSE</b>	<b>TIME</b>	<b>DEFENDANT(S)</b>
19	1/8/2013	7:37 p.m.	CARL WILES and WILLIAM GIDEON
20	1/9/2013	12:36 p.m.	CARL WILES and WILLIAM GIDEON
21	1/10/2013	12:55 p.m.	CARL WILES and WILLIAM GIDEON
22	1/10/2013	12:59 p.m.	CARL WILES and JUSTIN GOULD
23	1/22/2013	4:29 p.m.	CARL WILES and FUQUAN PULLIAM
24	1/23/2013	10:52 a.m.	CARL WILES and WILLIAM GIDEON
25	1/23/2013	10:57 a.m.	CARL WILES and FUQUAN PULLIAM
26	1/25/2013	10:26 p.m.	CARL WILES and MARQUEIS THOMAS RANDALL
27	1/29/2013	4:33 p.m.	CARL WILES and FUQUAN PULLIAM
28	1/31/2013	8:12 a.m.	CARL WILES, JUSTIN

			GOULD and WILLIAM GIDEON
29	2/1/2013	10:11 a.m.	CARL WILES and MARQUEIS THOMAS RANDALL
30	2/3/2013	3:08 p.m.	CARL WILES and JUSTIN GOULD
31	2/3/2013	8:05 p.m.	CARL WILES and MARQUEIS THOMAS RANDALL
32	2/4/2013	9:22 a.m.	CARL WILES and FUQUAN PULLIAM
33	2/13/2013	4:33 p.m.	FUQUAN PULLIAM and Unknown Male
34	2/21/2013	6:56 p.m.	FUQUAN PULLIAM and Unknown Male
35	2/24/2013	1:43 p.m.	KHALIL MIMS and JUSTIN GOULD
36	2/27/2013	9:47 a.m.	KHALIL MIMS and ELQUINZIE LEWIS
37	2/27/2013	10:11 a.m.	CARL WILES and KHALIL MIMS
38	2/28/2013	8:56 a.m.	CARL WILES and KEITH JACKSON
39	2/28/2013	9:08 a.m.	CARL WILES and KEITH JACKSON
40	3/1/2013	1:53 a.m.	KHALIL MIMS and ELQUINZIE LEWIS
41	3/1/2013	8:33 a.m.	KHALIL MIMS and ELQUINZIE LEWIS
42	3/1/2013	8:44 a.m.	KHALIL MIMS and FUQUAN PULLIAM
43	3/1/2013	9:15 a.m.	CARL WILES and KHALIL MIMS
44	3/1/2013	9:22 a.m.	CARL WILES and FUQUAN PULLIAM
45	3/1/2013	2:51 p.m.	CARL WILES and ELQUINZIE LEWIS
46	3/5/2013	3:39 p.m.	CARL WILES and FUQUAN PULLIAM
47	3/5/2013	11:45 p.m.	KHALIL MIMS and MARQUEIS THOMAS RANDALL
48	3/5/2013	3:58 p.m.	CARL WILES and KEITH JACKSON

49	3/5/2013	6:33 p.m.	CARL WILES and KEITH JACKSON
50	3/5/2013	7:52 p.m.	CARL WILES and KEITH JACKSON
51	3/5/2013	11:45 p.m.	KHALIL MIMS and MARQUEIS THOMAS RANDALL
52	3/7/2013	10:40 a.m.	CARL WILES and KEITH JACKSON
53	3/7/2013	5:16 p.m.	CARL WILES and KEITH JACKSON
54	3/7/2013	7:47 p.m.	KHALIL MIMS and MARQUEIS THOMAS RANDALL
55	3/7/2013	8:22 p.m.	CARL WILES and KEITH JACKSON
56	3/7/2013	9:16 p.m.	CARL WILES and KEITH JACKSON
57	3/7/2013	9:17 p.m.	CARL WILES, KHALIL MIMS and FUQUAN PULLIAM
58	3/9/2013	4:05 p.m.	CARL WILES and KHALIL MIMS
59	3/14/2013	11:20 a.m.	KHALIL MIMS and A.M.
60	3/15/2013	4:42 p.m.	KHALIL MIMS and MARQUEIS THOMAS RANDALL
61	3/18/2013	12:50 p.m.	CARL WILES and KEITH JACKSON

In violation of Title 21, United States Code, Section 843(b), and Title 18, United States Code, Section 2.

**COUNTS 62 to 65**  
**[Maintaining a Drug Involved Premises - 21 U.S.C. § 856]**

1. Paragraphs 2 through 14 of Count 1 of this Second Superseding Indictment are incorporated as if set forth in full herein.

2. From in or about December 2011 to in or about April 2013, in the District of New Jersey, and elsewhere, the defendants listed below, knowingly and intentionally opened and maintained a place for the purpose of manufacturing, distributing, and using cocaine and crack cocaine, both Schedule II drug controlled substances, and heroin, a Schedule I drug controlled substance:

COUNT	LOCATION	DEFENDANT(S)
62	367 Morris Street, Apt. 5 Woodbury, New Jersey	CARL WILES
63	4 Hunter Drive, Camden, New Jersey	CARL WILES
64	811 Olive Street, Camden, New Jersey	CARL WILES FUQUAN PULLIAM KAHLIL MIMS
65	2417A South 8 <sup>th</sup> Street, Camden, New Jersey	MARQUEIS THOMAS RANDALL

All in violation of Title 21, United States Code, Section 856(a)(1).

**COUNT 66**  
**[18 U.S.C. § 922 – Felon in Possession of a Firearm]**

1. Paragraphs 2 through 14 of Count 1 of this Second Superseding Indictment are incorporated as if set forth in full herein.

2. On or about April 9, 2013, in Camden County, in the District of New Jersey, and elsewhere, defendant

CARL WILES,  
a/k/a “Call Call,”

having been convicted of a crime punishable by imprisonment for a term exceeding one year in a court in the State of New Jersey, did knowingly possess, in and affecting commerce, firearms, namely, one Springfield Armory, model XD, 9 mm semi-automatic handgun, bearing serial number US843488; one Smith and Wesson, model MP, .40 caliber semi-automatic handgun, bearing serial number DTK2514; one Norinco, model SKS, 7.62 mm rifle, bearing serial number 1711120, and a 100-round drum magazine; one Beretta, model Tomcat, .32 caliber semi-automatic handgun, bearing serial number DAA392505, with a laser sight; one Mossberg, model 500A, 12-gauge shotgun with a pistol grip, bearing serial number J823912; one Smith and Wesson, model .38 Special, .38 caliber revolver handgun, bearing serial number AYW4147; one CN Roman SA, model AK-47, 7.62 mm rifle, bearing serial number GS-0605-76; one Colt, model AR-15, .223 caliber rifle, with an obliterated serial number, loaded with a 30-round magazine and a 100-round magazine found nearby; one Cobray, model M11, 9mm semi-automatic



machine pistol, with an obliterated serial number, and with an extended 30-round magazine.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT 67**  
**[18 U.S.C. § 922 – Felon in Possession of a Firearm]**

1. Paragraphs 2 through 14 of Count 1 of this Second Superseding Indictment are incorporated as if set forth in full herein.

2. On or about April 9, 2013, in Camden County, in the District of New Jersey, and elsewhere, defendant

FUQUAN PULLIAM,  
a/k/a “Fu,”

having been convicted of a crime punishable by imprisonment for a term exceeding one year in a court in the State of New Jersey, did knowingly possess, in and affecting commerce, firearms, namely, one Colt, model .38 Special, .38 caliber revolver, bearing serial number 8781754; one Bryco Arms, model Jennings Nine, 9 mm semi-automatic handgun, bearing serial number 1376519; one Hi-Point, model JHP 45 ACP, .45 caliber semi-automatic handgun, bearing serial number, X400750; and one H & K, model USP Compact 45 Auto, .45 caliber semi-automatic handgun, bearing serial number 29-030495, and ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT 68**  
**[18 U.S.C. § 922 – Felon in Possession of a Firearm]**

1. Paragraphs 2 through 14 of Count 1 of this Second Superseding Indictment are incorporated as if set forth in full herein.

2. On or about April 9, 2013, in Camden County, in the District of New Jersey, and elsewhere, defendant

KAHLIL MIMS,  
a/k/a “Lil,”

having been convicted of a crime punishable by imprisonment for a term exceeding one year in a court in the State of New Jersey, did knowingly possess, in and affecting commerce, firearms, namely, one Glock, model 36, .45 caliber semi-automatic handgun, bearing serial number FTW580, and ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT 69**  
**[18 U.S.C. § 922 – Felon in Possession of a Firearm]**

1. Paragraphs 2 through 14 of Count 1 of this Second Superseding Indictment are incorporated as if set forth in full herein.

2. On or about April 9, 2013, in Camden County, in the District of New Jersey, and elsewhere, defendant

JUSTIN GOULD,  
a/k/a “Jay,”

having been convicted of a crime punishable by imprisonment for a term exceeding one year in a court in the State of New Jersey, did knowingly possess, in and affecting commerce, a firearm, namely, one Ruger, Security-Six, .357 caliber handgun, bearing serial number 157-33809, and ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT 70**

**[18 U.S.C. § 922 – Felon in Possession of a Firearm]**

1. Paragraphs 2 through 14 of Count 1 of this Second Superseding Indictment are incorporated as if set forth in full herein.

2. On or about April 9, 2013, in Camden County, in the District of New Jersey, and elsewhere, defendant

MARQUEIS THOMAS-RANDALL,  
a/k/a “Marqueis Randall,”  
a/k/a “Marty,”

having been convicted of a crime punishable by imprisonment for a term exceeding one year in a court in the State of New Jersey, did knowingly possess, in and affecting commerce, a firearm, namely, one Browning, model Luger, 9 mm semi-automatic handgun, serial number 245NP50266, and ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**FORFEITURE ALLEGATION**

1. The Grand Jury realleges and incorporates by reference the allegations contained in Count One of this Second Superseding Indictment for the purpose of noticing forfeiture pursuant to Title 21, United States Code, Section 853.

2. As a result of the foregoing offense, defendants CARL WILES, a/k/a "Call Call," FUQUAN PULLIAM, a/k/a "Fu," KHALIL MIMS, a/k/a "Lil," KEITH JACKSON, a/k/a "Tick," JUSTIN GOULD, a/k/a "Jay," MARQUEIS THOMAS RANDALL, a/k/a "Marty," WILLIAM GIDEON, a/k/a "Will," and ELQUINZIE LEWIS, a/k/a "Quince Lewis," shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853(a)(1) and (2), any and all property constituting and derived from any proceeds defendant CARL WILES, a/k/a "Call Call," FUQUAN PULLIAM, a/k/a "Fu," KHALIL MIMS, a/k/a "Lil," KEITH JACKSON, a/k/a "Tick," JUSTIN GOULD, a/k/a "Jay," MARQUEIS THOMAS RANDALL, a/k/a "Marty," WILLIAM GIDEON, a/k/a "Will," and ELQUINZIE LEWIS, a/k/a "Quince Lewis" obtained directly and indirectly as a result of the violation alleged in Count 1 of this Second Superseding Indictment and any and all property used and intended to be used in any manner and part to commit and to facilitate the commission of the violation, including but not limited to the following:

a. Approximately \$213,695.00 (which includes \$114,870 seized on April 9, 2013 from 367 Morris Street, Apt. 5, Woodbury, New Jersey and \$66,102 seized on April 9, 2013 from 4 Hunter Drive, Camden, New Jersey) in



United States currency, in that such sum constitutes and is derived, directly and indirectly, from proceeds traceable to the commission of the conspiracy to distribute and to possess with intent to distribute cocaine, a Schedule II controlled substance, crack cocaine, a Schedule II drug controlled substance, and heroin, a Schedule I drug controlled substance and is intended to be used in any manner and part to commit and to facilitate the commission of said offense.

b. The following firearms: A Rossi, M518, .22 caliber handgun, serial number L054801; a Ruger, Security-Six, .357 caliber handgun, serial number 157-33809; a Browning, Luger, 9 mm handgun, serial number 245NP50266; a Colt, .38 Special, .38 caliber revolver, serial number 8781754; a Bryco Arms, Jennings Nine, 9 mm handgun, serial number 1376519; a Hi-Point, JHP 45 ACP, .45 caliber handgun, serial number, X400750; an H & K, USP Compact 45 Auto, .45 caliber handgun, serial number 29-030495; a Glock, 36, .45 caliber handgun, serial number, FTW580; a Springfield Armory, XD, 9 mm handgun, serial number US843488; a Smith and Wesson, MP, .40 caliber handgun, serial number DTK2514; a Norinco, SKS, 7.62mm rifle, serial number 1711120, and a 100-round drum magazine; a Beretta, Tomcat, .32 caliber handgun, serial number DAA392505, with a laser sight; a Mossberg, 500A, 12-gauge shotgun with a pistol grip, serial number J823912; a Smith and Wesson, .38 Special, .38 caliber handgun, serial number AYV4147; a CN Roman SA, AK-47, 7.62mm rifle, serial number GS-0605-76; a Colt, AR-15, .223 caliber rifle, with an obliterated serial number, loaded with a 30-round

magazine and a 100-round magazine found nearby; a Cobray, M11, 9mm handgun, with an obliterated serial number, and with an extended 30-round magazine.

3. If the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of defendants CARL WILES, a/k/a "Call Call," FUQUAN PULLIAM, a/k/a "Fu," KHALIL MIMS, a/k/a "Lil," KEITH JACKSON, a/k/a "Tick," JUSTIN GOULD, a/k/a "Jay," MARQUEIS THOMAS RANDALL, a/k/a "Marty," WILLIAM GIDEON, a/k/a "Will," and ELQUINZIE LEWIS, a/k/a "Quince Lewis" up to the value of the above described forfeitable property.

A TRUE BILL

FOREPERSON

Paul J. Fishman  
PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: 13-429 (RBK)

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United States District Court  
District of New Jersey

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UNITED STATES OF AMERICA

v.

CARL WILES, a/k/a "Call Call,"  
FUQUAN PULLIAM, a/k/a "Fu,"  
KHALIL MIMS, a/k/a "Lil,"  
KEITH JACKSON, a/k/a "Tick,"  
JUSTIN GOULD, a/k/a "Jay,"  
MARQUEIS THOMAS RANDALL, a/k/a "Marty,"  
WILLIAM GIDEON, a/k/a "Will," and  
ELQUINZIE LEWIS, a/k/a "Quince Lewis"

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SECOND SUPERSEDING INDICTMENT FOR

21 U.S.C. § 846  
21 U.S.C. § 841  
21 U.S.C. § 843  
21 U.S.C. § 856  
18 U.S.C. § 922  
18 U.S.C. § 924  
18 U.S.C. § 2

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A True Bill

Foreperson

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PAUL J. FISHMAN.  
U.S. ATTORNEY  
NEWARK, NEW JERSEY

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JASON M. RICHARDSON  
Assistant U.S. Attorney  
ERIN M. FAY  
Special Assistant U.S. Attorney  
Camden, New Jersey  
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